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October 29, 1998

U.S. Department of Transportation Dockets
Docket Number FAA-98-45 18 - 3
400 Seventh Street, S.W.
Room Plaza 40 1
Washington, D.C. 20590

DEPT. OF TRANSPORTATION
DOCKET 18-3
98 NOV -3 PM 1:30

Re: Licensing and Training of Pilots, Flight Instructors, and Ground Instructors
Outside the United States

Comments: Battle Creek Unlimited, Inc. ("BCU"), is the business development arm for the City of Battle Creek, Michigan. The City of Battle Creek is the host community for the Western Michigan University School of Aviation Sciences which has entered into training contracts with British Airways, Aer Lingus, and Emirates Air.

BCU supports the action taken by the Federal Aviation Administration to remove regulations that restrict the licensing of foreign persons outside of the United States, and restrict the operation of pilot schools and training centers that are located outside the United States.

Further, we believe the FAA has taken a significant step toward a genuine harmonization with the JAA on licensing and training by eliminating this language. We hope the JAA recognizes the sincere attempts by the FAA to make fundamental concessions in favor of harmonization and free trade.

We hope the JAA will reciprocate and eliminate ownership and place of business references from its own proposed regulations. We believe the airlines passenger industry is one of the world's most globalized businesses and that safety considerations can be addressed through monitoring and supervision, rather than restrictive trade language.

Retention of such regulations by the JAA would bring economic dislocation to the City of Battle Creek. We applaud the FAA's position in favor of free and open trade in the licensing and training of pilots, flight instructors, and ground instructors outside the United States.

If we are able to answer any questions or provide additional information, please contact me. Thank you very much.

Sincerely,

A handwritten signature in black ink, appearing to read "James F. Hettinger".

James F. Hettinger
President and CEO